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ELSON, RM

LUOLE, AH

SHOP, ML B, CRANIAS

SS, G

ROL, MS

DORE G

RGENT, D

MONSON, DP THERILL VF ONG, D

IDERSON, TW TOCKMAN, DA

VERNIER, RJ XXHART, FR

KOW, TE

JINGER, S

ISK, WC

SCITTO, DG

HASSBURGER

W.JE LEY, D

E, DG

JFFY, GG

RETHEL T

LLER, HG SHIMOTO, GI

ECE. R

EID, GH

EWARD, JD

SDOM, G

CORDS

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NDERPUY, M

STMEYER, RM GILARO, J

JEFMAN, GN CORMICK, MS

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION VIII**

999 18th STREET - SUITE 500 DENVER, COLORADO 80202-2405 2 2 2 2 3

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Ref: 8HWM-FF

Mr. David P. Simonson Department of Energy Rocky Flats Area Office P.O. Box 928 Golden, CO 80402-0928

re: OU 2 Bedrock Workplan Comments

Dear Mr. Simonson:

This letter transmits EPA's comments on the subject document as submitted 5 February 1991. Attached please find these comments, and those of our technical review contractor. Comments from the State of Colorado will be submitted separately.

The plan submitted represents a distinct improvement over those presented previously in the overall understanding of and technical approach to the RI process. However, given that this is the second (bedrock) half of what will be a single OU 2 Phase II RI, it seems corpulent in some areas and skeletal in others. Background information (largely taken from the alluvial plan) makes up a much larger portion of the document than the Field Sampling Plan, which is really the heart of the matter. It would seem that sections 1-6 could be greatly abbreviated without weakening the presentation.

It also must be clearly understood that the Phase II Bedrock investigation is not merely a prelude to a full scale RI. This plan should lay out the investigation necessary to characterize bedrock conditions to the extent required for risk assessment and remedial action decision making. The plan can be amended if necessary based on early findings, but the full anticipated RI scope must be identified in this plan.

Please coordinate with and direct questions on these matters to Mr. William Fraser, EPA OU 2 RPM, at 294-1132.

Sincerely,

Markin Herhand

Martin Hestmark, Manager Rocky Flats Project

CC: Peter Ornstein, 8RC
Barbara Barry, CDH-RFPU
Frazer Lockhart, DOE
Brent Lewis, DOE
Bill Fraser, 8HWM-FF

FCD: May 1, 1991:doe01 may.ltr:wgf